

JOSEPH P. RUSSONIELLO (CSBN 44332)
 United States Attorney
 BRIAN J. STRETCH (CABN 163973)
 Chief, Criminal Division
 THOMAS MOORE (ASBN 4305-O78T)
 Assistant United States Attorney
 Chief, Tax Division
 10th Floor Federal Building
 450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102
 Telephone: (415) 436-7017

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR-10-0146 VRW
)	
Plaintiff,)	
)	
v.)	STIPULATION AND
)	PROPOSED PROTECTIVE ORDER
MARIA VIRGINIA REYES and)	
CHRISTINE REYES,)	
)	
Defendants.)	
)	

STIPULATION

The United States and defendants, Maria Virginia Reyes and Christine Reyes, through undersigned counsel, hereby stipulate and agree as follows:

1. The United States is prepared to produce to each defendant's counsel of record in this matter discovery containing sensitive tax, personal and/or financial information of third parties, subject to the following conditions.

2. No counsel of record shall disclose any documents or information produced by the United States to anyone except his or her client, any defense witnesses, experts or investigators retained in this case, or any defense staff working on the case, and no defendant, defense

witnesses, experts or investigators, or defense staff shall disclose such documents or information to anyone, absent further order of the Court. However, this limitation on disclosure shall not limit disclosure of the abovementioned information at trial.

3. The documents and information described above shall be used only to prepare and evaluate the defense in this proceeding. Any person to whom the documents or information are disclosed must be provided with a copy of this Stipulation and Order. The materials provided to defense counsel pursuant to this order, and any copies thereof, shall be returned to the government at the conclusion of this case.

4. The documents described above shall not be copied at all unless copying is necessary for preparation of the defense in this proceeding. Any copy of the materials that is made shall be accompanied at all times by a copy of this Stipulation and Order. No document or copy thereof shall be left with any defense witness.

5. Defense counsel, defendant, defense staff and their witnesses, experts and investigators in this case shall retain possession and/or custody of the documents at all times.

BARRY J. PORTMAN
Federal Public Defender

JOSEPH P. RUSSONIELLO
United States Attorney

/s/ Loren D. Stewart
LOREN D. STEWART
Assistant Federal Public Defender
Attorneys for Maria Virginia Reyes

/s/ Thomas Moore
THOMAS MOORE
Assistant United States Attorney
Tax Division
Attorneys for the United States

/s/ David Shapiro
DAVID SHAPIRO
BOIES, SCHILLER, & FLEXNER LLP
Attorneys for Christine Reyes

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: June 30, 2010

